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7	Attorneys for Defendant		
8	UNITED STATES DISTRICT COURT		
9			
10	DISTRICT OF NEVADA		
11	LUIS TAYLOR,)	
12	Plaintiff,) Case No. 2:25-cv-00303-GMN-MDC	
13	v.	STIPULATION TO VOLUNTARYREMAND PURSUANT TO SENTENCE	
14	FRANK BISIGNANO,) FOUR OF 42 U.S.C. § 405(g) AND TO) ENTRY OF JUDGMENT FOR	
15	Commissioner of Social Security,) PLAINTIFF)	
16	Defendant.		
17		_)	
18			
19	The parties, through their respective counsel, stipulate to the following matters. The		
20	Commissioner's final decision should be reversed and remanded for further administrative		
21	proceedings before an Administrative Law Judge (ALJ). The ALJ should further develop the record,		
22	as appropriate, obtain supplemental vocational evidence to assess whether there are jobs in significant		
23	numbers that Plaintiff can still do, and issue a new decision. The ALJ should reevaluate the evidence		
24	and the step-five finding, as necessary.		
25	Remand should be made under sentence four of 42 U.S.C. § 405(g). See Melkonyan v. Sullivan,		
26	Remaind should be made under sentence	20 10th 01 42 0.5.0. § 405(g). See Methonyan v. Suttivan,	

501 U.S. 89 (1991). Plaintiff should be entitled to reasonable attorney fees and expenses pursuant to	
28 U.S.C. § 2412(d), upon proper request to this Court. Plaintiff should be entitled to costs as	
enumerated in 28 U.S.C. § 1920, under 28 U.S.C. § 2412(a).	
The parties further request that the Clerk of the Court be directed to enter a final judgment in	
favor of Plaintiff and against Defendant, reversing the Commissioner's final decision.	
Dated: June 18, 2025 Respectfully submitted,	
<u>/s/ Kate Mara Albert</u> KATE MARA ALBERT	
(*as authorized via email) Attorney for Plaintiff	
Dated: June 18, 2025 Respectfully submitted,	
SUE FAHAMI	
Acting United States Attorney	
/s/ Jeffrey E. Staples JEFFREY E. STAPLES Special Assistant United States Attorney Attorneys for Defendant	
IT IS SO ORDERED?	
All her	
UNITED STATES DISTRICT JUDGE	
CIVILD STRIPES DISTRICT SCOOL	
DATED: June 20, 2025	
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-entitled action. On the date set forth below, I caused a copy of the above STIPULATION TO VOLUNTARY REMAND PURSUANT TO SENTENCE FOUR OF 42 U.S.C. § 405(g) AND TO ENTRY OF JUDGMENT FOR PLAINTIFF to be served upon the following by:

CM/ECF:

Kate Mara Albert fdc@ssihelp.us

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 18, 2025

/s/ Jeffrey E. Staples
JEFFREY E. STAPLES

Special Assistant United States Attorney